

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 05-27-KAJ
	:	
TAHRIA PARKS,	:	
	:	
Defendant.	:	

**PETITION FOR WRIT OF  
HABEAS CORPUS AD PROSEQUENDUM**

Your petitioner, the United States of America, by its attorney, Beth Moskow-Schnoll, Assistant United States Attorney, with the knowledge and consent of Colm F. Connolly, United States Attorney for the District of Delaware, respectfully shows:

1. The defendant is scheduled to appear before this Court on August 2, 2005, at 11:00 a.m. to plead guilty to counterfeit currency charges.
2. The defendant is currently being held at Women's Correctional Institute in New Castle, Delaware on pending State charges and must be writtten out before this Court can conduct the change of plea hearing.

WHEREFORE, petitioner prays that the Clerk of the Court be instructed to issue a writ of habeas corpus ad prosequendum to the United States Marshal for the District of Delaware and to the Warden of Women's Correctional Institute, to deliver Tahria Parks to the office of the

United States Marshal for the District of Delaware on August 2, 2005, at 11:00 a.m. with the defendant being returned to State custody after the hearing.

Respectfully submitted,

COLM CONNOLLY  
United States Attorney

BY: /s/  
Beth Moskow-Schnoll  
Assistant United States Attorney

Dated: July 28, 2005

IT IS SO ORDERED this \_\_\_\_ day of July, 2005.

Honorable Kent A. Jordan  
United States District Judge